

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

24-1290

UNITED STATES OF AMERICA

v.

DONNY S. ADELMAN

Magistrate Case No. E2065052 (Class A)

COMPLAINT

Offense on a Federal Reservation

BEFORE the **Honorable Andrea Dechenne Bergman**, a United States Magistrate for the Judicial District of New Jersey, specially designated to try and sentence persons committing misdemeanor offenses against the laws of the United States on a Federal reservation, personally appeared this day **Luke D. Wilson**, Special Assistant U.S. Attorney for the District of New Jersey, who, under oath charges that:

On or about the **29th day of July 2024**, at Joint Base McGuire-Dix-Lakehurst, New Jersey, in the Judicial District of New Jersey,

DONNY S. ADELMAN did commit:

Photographing Defense Installations in violation of 18 U.S.C 795.

The name of the Complainant is **Luke D. Wilson**.



LUKE D. WILSON, DAF, Civ
Special Assistant United States Attorney

SWORN TO BEFORE ME, AND SUBSCRIBED IN MY PRESENCE, JOINT BASE MCGUIRE-DIX-LAKEHURST, NEW JERSEY, ON THIS 5TH DAY OF DECEMBER 2024.



HONORABLE ANDREA DECHENNE BERGMAN
United States Magistrate Judge

STATEMENT OF PROBABLE CAUSE
(For Issuance of an arrest warrant or summons)


I state that on 2 October, 2024 while exercising my duties as a law enforcement officer in the Federal District of SB, MD, MS

Subject did violate 18 USC 795
by videotaping the Entry Control Point
at Joint Base MDL without the
Installation Commander's permission.

The foregoing statement is based upon:

- ☐ my personal observation ☒ my personal investigation
☒ information supplied to me from my fellow officer's observation
☐ other (explain above)

I declare under penalty of perjury that the information which I have set forth above and on the face of this violation notice is true and correct to the best of my knowledge.

Executed on: 10/02/2024 
Date (mm/dd/yyyy) Officer's Signature

Probable cause has been stated for the issuance of a warrant.

Executed on: _____
Date (mm/dd/yyyy) U.S. Magistrate Judge

HAZMAT = Hazardous material involved in incident; PASS = 9 or more passenger vehicle;
CDL = Commercial drivers license; CMV = Commercial vehicle involved in incident